

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
)	
UNITED STATES)	
)	Cr. No. 05-10048-RCL
)	
v.)	
)	
GLADYS ARCE)	
)	
_____)	

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Now comes the defendant, Gladys Arce, and respectfully moves this Honorable Court to modify the conditions of her pretrial release, and allow her to change her residence. Ms. Arce was informed by her landlord that she was required to move from her subsidized two bedroom apartment at 5 Interval Street to a subsidized one bedroom apartment a few blocks away at 2 Waverly Street, Apartment 102, Roxbury. Apparently she was considered to be "overhoused". She was given short notice of the move date, and has been moved by the landlord. She moves the Court to modify the conditions of her release to allow her to reside at the new address. Undersigned counsel has discussed the foregoing with Pretrial Services and there is no objection to the allowance of this Motion.

For the foregoing reasons, the defendant prays the Court allow this Motion.

Respectfully Submitted,
Gladys Arce
By his attorney

/s/ Michael C. Andrews
Michael C. Andrews
21 Custom House Street
Boston, Massachusetts 02110
(617) 951-0072
BBO# 546470